



Order Filed on March 12, 2019  
by Clerk U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR  
9013-4**

DAVID A. KASEN, ESQUIRE (ID#DK1778)  
KASEN & KASEN, P.C.  
Society Hill Office Park, Suite 3  
1874 E. Marlton Pike  
Cherry Hill, New Jersey 08003  
Telephone: (856) 424-4144  
Facsimile: (856) 424-7565  
E-Mail: dkasen@kasenlaw.com  
*Withdrawing Counsel to Debtor(s)*

In Re: : Case No. 16-24335/JNP  
  
PAUL W. CRANE, JR. and JOANNA L. : Chapter 13  
CRANE, :  
  
Debtors. : Hearing Date: 2/26/19  
  
: Judge: Poslusny

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**CONSENT ORDER RE MOTION TO MODIFY DEBTORS' CHAPTER 13 PLAN  
AND WITHDRAW AS DEBTORS' COUNSEL**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby  
**ORDERED.**

**DATED: March 12, 2019**

A handwritten signature in dark ink, appearing to read "J. Poslusny", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Case No.: 16-24335/JNP

Debtor(s): PAUL W. CRANE, JR. and JOANNA L. CRANE

Caption of Order: CONSENT ORDER RE MOTION TO MODIFY DEBTORS' CHAPTER 13 PLAN AND WITHDRAW AS DEBTORS' COUNSEL

THIS MATTER having been opened to the Court by David A. Kasen, Esquire, of Kasen & Kasen, P.C., pursuant to a Motion to Modify Debtors' Chapter 13 Plan and Withdraw as Debtors' Counsel, and it appearing that the Court entered an Order on January 24, 2019 authorizing Kasen & Kasen to withdraw as counsel to the Debtors; and

IT FURTHER APPEARING that the Court continued the hearing with respect to the Motion of Kasen & Kasen, P.C. to Modify Debtors' Chapter 13 Plan; and

IT FURTHER APPEARING that Kasen & Kasen, P.C. and the Debtors, Paul W. Crane, Jr. and Joanna L. Crane, have reached agreement as to the balance of the Motion, and for good cause shown;

IT IS HEREBY ORDERED as follows:

1. Kasen & Kasen, P.C. agrees to withdraw the Motion to Modify the Debtors' Chapter 13 Plan.
2. The Debtors shall pay the balance due on account of the October 30, 2018 Order Allowing Kasen & Kasen, P.C. Fees and Expenses, which shall be paid from the proceeds of the sale or refinance of the Debtors' property at 386 Route 130, Swedesboro, New Jersey 08085, or if alternatively, the property at 386 Route 130, Swedesboro, New Jersey 08085 shall not be sold or refinanced prior to the 60<sup>th</sup> month from the date of filing, then the balance shall be immediately paid thereafter by the Debtors to Kasen & Kasen, P.C. outside the Plan.

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3. If the balance due on account of the October 30, 2018 award of fees and expenses by the Court has not been paid by the Debtors pursuant to this Order as aforesaid, then such amounts as are still due and owing shall not be discharged by virtue of any Order of this Court, and shall survive any discharge order in this case or any subsequent discharge order in a conversion or new bankruptcy case that may be filed.

We hereby consent to the form and entry of the within Order.

KASEN & KASEN, P.C., Movant

By: /s/ David A. Kasen  
DAVID A. KASEN, ESQUIRE

/s/ Paul W. Crane  
PAUL W. CRANE

/s/ Joanna Crane  
JOANNA L. CRANE